

CUPA: Shasta County Environmental Health

Date of Evaluation: October 25, 2005

State Evaluation Team:

Cal/EPA Team Leader: Tina Gonzales

OES Evaluator: Jack Harrah

Please complete status report

Deficiencies and Corrective Actions Status Report

1. **Deficiency:** CUPA not meeting required UST inspections each year.

CUPA Corrective Action: As indicated in our initial response we have tracked the inspection totals on a quarterly basis and provided additional reporting training to the underground tank inspector to ensure that all required inspections are being completed and recorded. On June 5th, with 25 days left in the reporting year we have approximately 11 sites (~8%) to inspect, at least 3 of which are inactive sites that are not storing fuel and are in temporary closure or are in the process of being removed.

2. **Deficiency:** CUPA UST files lack documentation that indicates violations noted during inspections have been corrected.

CUPA Corrective Action: The UST inspector has been using a checklist that is generated for each site noting what is needed from the facility and checking off items as they are corrected. He has not been using the certification of compliance that has been used for hazardous waste inspections. The UST inspector has been instructed to use this form to allow the facilities to certify that certain violations/deficiencies have been corrected, while other violations may require submission of testing results or paperwork required to satisfy permitting requirements. The certification of compliance may not be appropriate at all inspections.

3. **Deficiency:** During the last three years the CUPA has collected 85-90% of the surcharge needed to be collected.

CUPA Corrective Action: This last year we have had a lot of success collecting past due fees from several facilities. The threat of Circuit Environmental Prosecutor(CEP) involvement has been useful, though we are unclear about the future of CEP assistance to our department as a result of changes in staffing, and no longer having a CEP based in Redding. If we continue to have trouble collecting fees we will look to other methods to achieve this goal.

- 4. Deficiency:** CUPA has not yet obtained Business Plans from all farms and is not conducting inspections of all agricultural handlers.

CUPA Corrective Action: We have contacted to Ag department to arrange attending upcoming meetings that many of the Ag facilities take part in. During meetings we will discuss the Business Plans and handout the required forms.

- 5. Deficiency:** Due to substantial increase in the number of regulated businesses the CUPA has not inspected each business plan facility every three years. With the addition of Ag facilities this could make the situation worse.

CUPA Corrective Action: As with the UST program, we have been tracking the number of inspections completed on a quarterly basis with the intent of inspecting 1/3 of all sites each year. As of June 5th we have inspected ~36% of all sites and intend to do more before the end of this reporting year. The hope is to keep up this pace next year to make up for past years lower inspection totals. Assuming staffing remains the same the CUPA programs expect to get some assistance from our water program manager who will have some time freed up this next year.

Status Report completed by Jim Whittle